

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

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 FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

In the Matter of)
)
) WT Docket No. 97-207
 Calling Party Pays Service Offering)
 in the Commercial Mobile Radio Services)

**REPLY COMMENTS
 OF THE
 UNITED STATES TELEPHONE ASSOCIATION**

The United States Telephone Association ("USTA") hereby files its reply comments in response to the Commission's *Declaratory Ruling and Notice of Proposed Rulemaking*.

USTA is the principal trade association of the incumbent local exchange carrier industry.

Recently, Chairman Kennard commented on competition in the wireless industry:

There have been some very, very tangible successes out of that Act. The wireless industry is a good example. We have a lot of competition in wireless. Consumers are paying 40 percent less for wireless services today than they were three years ago when the Act was signed into law.¹

USTA agrees with the sentiments expressed by Chairman Kennard. Marketplace competition, and not costly, administratively burdensome mandatory government regulations, is

¹ Chairman Kennard's Comments on Newshour with Jim Lehrer, http://www.pbs.org/newshour/bb/fedagencies/July-dec99/kennard_10-7.html (October 7, 1999).

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the basis for this unprecedented growth in the use of wireless telephones. There is simply no need for the Commission to intervene in the competitive marketplace for wireless telephony.

Among comments filed, it is evident that mandatory billing and collection for CPP is neither supported by law² or necessary for CPP to be deployed by CMRS providers.³ The adverse impact of the Commission imposing mandatory billing and collection on small and rural carriers must not be overlooked. USTA agrees with comments that expensive new billing and collection regulations should not be adopted because small and rural carriers “have neither the financial, nor personnel resources” to respond to new Commission mandates.⁴ Even CTIA argues that there is no basis for the Commission to mandate ILEC billing and collection for CPP.⁵

² See, e.g., USTA Comments at 3-6 (ILEC billing and collection is a service, not a network element which is not subject to unbundling requirements in Section 251 of the Act); BellSouth Comments at 3-4 (Commission has no authority under Section 251 or ancillary jurisdiction to impose mandatory billing for CMRS provided CPP); Cincinnati Bell Comments at 8-10 (billing and collection is not a network element).

³ See, e.g., BellSouth Comments at 14 (alternatives to LEC billing and collection exists); GTE Comments at 31 (“requiring LECs to provide billing and collection services in connection with CPP is wholly unwarranted and would be flatly inconsistent with well-settled policies deregulating LEC billing and collection services”); SBC Comments at 8 (“The Commission has determined ... that CPP is a CMRS-provided option, which is or will be offered by the CMRS provider, not the LEC. Consequently, it is inappropriate to suggest that LECs should be, or even can be, required to bill and collect for CMRS-provided CPP.”).

⁴ NTCA Comments at 5. As NCTA explains, small and rural carriers are already upgrading their networks to accommodate current Commission mandates for CPNI and truth-in-billing requirements. *Id.*

⁵ See CTIA Comments at 38 (“It is premature to assume that CPP services cannot develop without access to LEC billing and collection services.”).

There is no public demand for CPP. Moreover, the cost of implementing billing and collection should not be borne by ILECs. Indeed, there is general consensus that mandatory billing and collection is not needed to implement CPP. USTA, however, does not oppose CPP being offered by CMRS providers to consumers.⁶ Interested parties should voluntarily negotiate agreements, including billing and collection arrangements, for deployment of CPP. Contrary to comments filed,⁷ there are clearly alternative providers of billing and collection services which can meet the needs of CMRS providers offering CPP.⁸ In its comments, BellSouth discusses at great length why mandatory ILEC billing and collection for CMRS deployed CPP is not necessary given the availability of third party alternatives:

[T]he immediate availability of alternative methods which allow CPP billing and collection to be conducted by the CMRS carrier providing CPP demonstrates that it is clearly not necessary for the Commission to re-regulate ILEC billing and collection. Specifically, as of October 1998, nearly 10 months ago, the trade

⁶ USTA Comments at 1-2 ("USTA does not oppose voluntary Calling Party Pays ("CPP") arrangements. The marketplace, not mandatory Commission regulations, should govern the deployment of CPP. In comments filed in this proceeding, USTA has consistently argued that the Commission should not use CPP as a tool for steering development of CMRS, and that the Commission should not re-regulate ILEC billing and collection operations, which were detariffed in 1986, and that ILECs should not be forced to bear the financial risks of CMRS providers offering CPP.").

⁷ See AirTouch Comments at 10-21 (AirTouch makes the erroneous argument that ILEC billing and collection is "essential" to the successful deployment of CPP); VoiceStream Comments at 5 (VoiceStream makes an equally bald assertion that CPP will not be deployed without mandatory ILEC billing and collection for this CMRS provided service).

⁸ In its Comments, USTA explained that there are at least seven publicly traded companies providing billing and collection services to the telecommunications industry. USTA Comments at 7 ("Clearly, an entire billing and collection industry has emerged as an alternative to ILEC billing and collection arrangements.").

press was already reporting the existence of at least two products designed to allow wireless carriers to control CPP billing and collection. Those products ... offer CMRS carriers cost-effective network-based alternatives to the LEC billing approach.⁹

The availability of cost-effective third party billing and collection alternatives for CMRS operators who provision CPP makes any discussion about the need to re-regulate billing and collection, or establishing such services as an unbundled network element ("UNE"), superfluous. USTA urges the Commission to recognize that market-driven competition, and not mandated centralized government regulations, has been the single most important force that has lead to the unprecedented growth in the use of wireless telephony. The consumer benefits of marketplace competition include service plans offering consumers unlimited services and options, and as Chairman Kennard has acknowledged tremendous price reductions because CMRS providers have aggressively promoted the benefits of wireless services. As a result of private sector generated competition, wireless telephony is now a viable second alternative, and increasingly a primary telephony option for consumers over wireline service options. Overwhelming consumer demand for CMRS services is a reflection of successful marketing, pricing and the multitude of options made available in the marketplace by CMRS providers. This is true marketplace competition. The horizon for further growth in wireless usage is limitless. In a recent review of the domestic wireless market, Merrill Lynch observed:

- What's up with wireless in the US?
- As we said earlier this year, it looks as though 1999 will be

⁹ BellSouth Comments at 14-15.

a year of accelerating penetration gains in the US wireless market.

- We estimate that the US wireless industry as a whole added approximately 8.4 million net subscribers during the first half of 1999, for an ending base of 77.6 million subscribers, and could be poised to add an additional 10 million plus during the second half of this year.
- As a result, for 1999, we estimate that the US wireless industry will add 18.8 million net subscribers versus 13.9 million during 1998, for an ending base of 88 million subs (up from the previous estimate of 83 million). That's 5 million more subscribers than we previously estimated.
- Overall we think subscriber growth is accelerating. In addition we believe that as rates grow more competitive, as coverage improves and as customers grow more accustomed to using their wireless phones, subscribers will use their wireless phones more and more in place of using the landline network.¹⁰

The CMRS industry is experiencing explosive growth driven by marketplace competition, and not government mandates or implementation of regulatory schemes in other countries and continents. Fueling this growth is better digital coverage, competitive pricing, and the acceleration of consumer demand for mobility.¹¹ The Commission should avoid adopting

¹⁰ Linda Mutschler and Naeemah Lajoie, Merrill Lynch report United States Telecommunications/Wireless Services, *The Matrix -2Q 99*, September 1, 1999.

¹¹ PCIA provided a report on the benefits of CPP to consumers based upon the application of CPP in other countries. See PCIA Comments *Impact of Calling Party Pays CPP on Systems Infrastructure*. The relevant market for Commission consideration, however, should be the domestic market for CMRS services. USTA does not oppose CMRS providers voluntarily offering CPP to consumers. USTA does oppose re-regulation of billing and collection, designation of billing as a UNE, and imposition of any costs associated with CMRS providers provisioning CPP on ILECs. The record in this proceeding establishes that potential CMRS providers of CPP acknowledge that mandatory ILEC billing and collection for CPP is

policies that may have the unintended consequence of impeding further growth and development of CMRS. Section 10 of the Act instructs the Commission to forebear from applying regulations where such regulations are not necessary to: (1) prevent discriminatory practices; (2) protect consumers; and (3) further the public interest.¹² By not re-regulating billing and collection, while permitting market forces to continue to drive the growth of CMRS, the Commission will fulfill the Congressional intent in Section 10.

A number of parties also raised concerns regarding the need to first resolve technical and operational issues surrounding the delivery of CPP by CMRS providers. For example, MCI argues that compensation, tracking of CPP calls, and numbering issues require further Commission and industry review.¹³ AT&T commented that implementation of CPP raises several technical and policy questions including the need to establish PBX blocking, numbering, compensation and truth-in-billing issues.¹⁴

USTA believes that CMRS providers have the resources necessary to offer CPP without the Commission needlessly re-regulating billing and collection services, or imposing costly and

unnecessary, that there are numerous billing and collection alternatives for CMRS providers who wish to offer CPP, and that ILECs should not be required to bear the cost of CMRS providers offering CPP to their customers.

¹² 47 U.S.C. §160. It is time for the Commission to recognize that consumers are sophisticated purchasers of telecommunications products and services, who have the capability to make informed consumer decisions without the heavy hand of government regulation at every checkpoint. The Commission has the authority to take corrective action should it be necessary.

¹³ MCI Comments at 5-16.

¹⁴ AT&T Comments at 6-9.

administratively burdensome obligations on ILECs. The Commission can encourage, and not mandate, the resolution of these issues by interested parties and relevant industry groups. USTA agrees with comments made by US WEST:

[I]n no event should LECs - - or the telecommunications industry in general - - be conscripted as maidservants to a less-than-certain marketplace success - - optional CPP offerings by CMRS providers. Carriers should not be expected to establish special dialing patterns or dedicated numbering resources to the offering. Billing and collection companies should not be mandated to bill for what will certainly be at least marginally controversial billings.

Either CPP will succeed in the market or it won't. The Commission should not intervene with a heavy regulatory hand to aid those limited CMRS providers interested in the offering. Nor should it order others in the industry to change their telecommunications infrastructure, customer relations or non-regulated commercial offerings to satisfy the desires of those who want aid in underwriting their offering.¹⁵

Regarding notification to consumers about billing charges for CPP, there is opposition to the Commission's proposal from the CMRS industry. Omnipoint, a CMRS provider and proponent of CPP, favors a "simple, unobtrusive and uniform" notification to consumers.¹⁶ According to Omnipoint, the "notification mechanism proposed by the Commission, however, is not simple; it would be extremely obtrusive; and it would be costly and burdensome to

¹⁵ US WEST Comments at iii; USTA Comments at 12 *citing* USTA's Reply Comments in this proceeding filed June 8, 1998 ("At a minimum, these schemes would require the Commission to re-regulate LEC billing and collection operations, which were deregulated in 1986. If permitted, these schemes would also unjustly force LECS to bear the financial risks of CMRS providers' offering of CPP.").

¹⁶ Omnipoint Comments at 3.

carriers.”¹⁷ In fact, Omnipoint argues that notification is unnecessary and urges the Commission to recognize that:

consumers receive charges for many calls today, without prior notification of the charges.... On these calls there is no notification of additional charges and there is no distinctive dialing pattern that would inform a caller that extra charges are to be incurred or accepted. For the Commission to consider a notification scheme for CPP that deviates from this already-accepted practice of billing the caller for additional charges without imposing intrusive notification would not be consistent with its intent to promote competition between wireline and wireless services.¹⁸

Clearly, there is disagreement over whether notification to consumers is even necessary and, if so, how it should be implemented. USTA has consistently support an industry solution to the notification question. Moreover, Motorola makes a persuasive argument that the Commission should not assume the “obligation of devising the ultimate notification method.”¹⁹ As Motorola explained “Detailed notification requirements written into formal agency rules certainly cannot be changed quickly” to adapt to changing market conditions.²⁰ In any event, the cost of developing and implementing a caller notification system for CMRS provided CPP should be borne by CMRS providers who benefit financially from the CPP service offering.

The Commission has determined that CPP is a commercial mobile radio service. CMRS providers who wish to offer CPP should bear the cost of providing the service. In no way

¹⁷ Omnipoint Comments at 3.

¹⁸ *Id.* at 3-4.

¹⁹ Motorola Comments at 6.

²⁰ *Id.* at 7.

should the Commission assume the role of assuring the success or failure of CPP offered by CMRS providers. As Qwest correctly states in its comments:

[U]nder the Commission's CPP proposal, it is the CMRS provider that will be providing the CPP service, it is the CMRS provider that should be ultimately responsible for billing and collection for that service. As is the case with customer notification, the CMRS provider is the entity with the rate and charge information necessary to create accurate bills for CPP services. This function could be delegated to a third party, but the CPP provider should be ultimately responsible for that function....

As the entity that will receive the benefits of providing the CPP service ... it is the CMRS provider that should be responsible for administering that service and the entity that should bear the costs of billing and collection for the service.²¹

The CMRS industry clearly has the interest, creativity and technical expertise to develop and offer CPP to their consumers without imposing their developmental and operational costs on ILECs. In the absence of mandatory re-regulation of billing and collection, billing as a UNE, or mandatory customer notification in furtherance of CPP, the phenomenal growth in wireless telephony will continue unabated. Market forces, competitive pricing, innovation, the need for mobility, and attention to customer service will drive consumer use of wireless products and services. The Commission has a unique opportunity to simply say no to the adoption of mandatory regulations which are unnecessary, inconsistent with the 1996 Act and judicial precedent, and which would place the Commission in the untenable position of asserting its considerable authority to make a market for CPP. Consumers of telecommunications services

²¹ Qwest Comments at 8-9.

are intelligent, informed, and inquisitive. They should be entrusted by the Commission to make choices which serve their individual interests. The Commission's proposals, if adopted, will add more costs to the deliver of wireless telephony - - costs which consumers of such services will pay in the form of higher fees. Moreover, ILEC customers should not be forced to subsidize the rollout of CPP provided by CMRS carriers. The Commission should trust market driven competition and the wisdom of savvy consumers, and not mandatory government regulations, regarding deployment of CPP by CMRS providers. As proponents of CPP, and the financial beneficiaries of potential consumer interest in this wireless service, CMRS providers of CPP must be required to absorb *all* the costs of its deployment.

Respectfully submitted,

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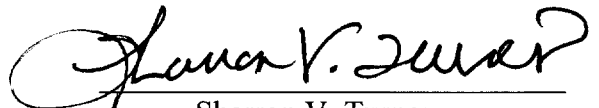
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I, Sharron V. Turner, do certify that on October 18, 1999 copies of the foregoing Reply Comments of the United States Telephone Associations were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.


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